

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : NO. 3:23-CR-
:
v. : (Judge)
:
DAWN TROTTA, : (Filed Under Seal)
:
Defendant. :

DECLARATION IN SUPPORT OF MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, submits the following Declaration in Support of the Government's Motion to Seal, pursuant to Local Criminal Rule 49.

1. Your declarant states that, in the view of your declarant, this declaration and the following documents should be filed under seal:

<input checked="" type="checkbox"/> Information	<input type="checkbox"/> Complaint & Affidavit
<input type="checkbox"/> Order for Arrest Warrant	<input type="checkbox"/> Motion for Downward Departure
<input checked="" type="checkbox"/> Plea Agreement	<input type="checkbox"/> Sentencing Memorandum
<input checked="" type="checkbox"/> Plea Agreement Addendum	

2. The United States requests that the above-referenced documents, and this Motion, remain under seal pending:

☐ Further Order of Court; or

☒ Written notification by the United States that these pleadings no longer need to remain filed under seal;
or

☐ _____

3. In support of this Motion, the United States alleges that filing these pleadings under seal is necessary in order to:

- ☒ Preserve the integrity of this ongoing case;
- ☐ Ensure the safety of investigative personnel;
- ☒ Protect the identity of potential witnesses;
- ☐ Allow for the seizure of evidence;
- ☐ Permit the arrest of those charged with violations of criminal laws; or
- ☐ Allow this defendant to complete the cooperation aspects of the plea agreement.

WHEREFORE, for the foregoing reasons, the United States moves to seal this Declaration and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

GERARD M. KARAM
United States Attorney

Date: May 30, 2023

/s/ James M. Buchanan
JAMES M. BUCHANAN
Assistant United States Attorney